



Kalamazoo River
Protection Association

Environmental activism since 1975
Protecting the Kalamazoo River Watershed and the Great Lakes

EPA Region 5 Records Ctr.



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Counter Proposal to US EPA River Modeling Plan 8-11-04

Recently US EPA indicated that it is hell bent on completing a so-called "river modeling study project over the next three years.

Since there is more than ample data to move forward with removals actions, EPA's strategy is ill advised and amounts to yet further study and further delay in implementing US EPA promised cleanup plans to remove the toxic dumps in our river. In 2002 the US EPA promised to release proposed plans for cleanup at the MDNR Plainwell and City of Otsego Impoundments by the summer of 2003 with removal actions to begin in late 2003. Proposed cleanup plans for the MDNR Otsego and Trowbridge Impoundments were to follow by the summer of 2004. Millions of dollars have been spent towards studying what needs to be done to restore the river.

Over the last thirty years, the volume, levels, distribution, and location of the toxic PCB waste in the water column, fish, wildlife, and river and floodplain sediments from the City of Allegan to Plainwell has been thoroughly documented. US EPA late date decision to move forward with yet another unneeded study amounts to a big-time polluter handout that will further delay the cleanup and not hold the polluters accountable for the cost of a meaningful cleanup. Further, little, if any significant new data or information is likely to result from the river modeling other than to create more ambiguity. In the past 12 years, US EPA staff, including Bill Muno, the former Director of Region V Superfund Program and Scott Cornelius, former MDEQ project manager of the site, rejected the modeling risk assessment studies as unnecessary and so do we.

US EPA deceived the public when they abandoned their cleanup commitment. According to US EPA "experts" the modeling study will determine what, if any parts of the millions of cubic yards of toxic PCB waste, will need to be removed from the river with the stated goal of making fish from the river "safe to eat". The Comprehensive Environmental Response Compensation Liability Act (CERCLA) requires much more. Commonly referred to as Superfund, CERCLA requires that US EPA **TIMELY** provide and implement remedial actions to assure long term

protection of public health and the environment and to hold the polluters accountable for the cost of the cleanup. The polluter's are Georgia Pacific Corp. (who recently acquired Fort James Corp. for 13 billion in cash, stocks etc.) and Millinium Holdings, Inc. the parent company of the Former Allied Paper Company, and Weyerhaeuser Corp., the parent company of the former Plainwell Paper, Inc. US EPA has demonstrated clearly that their present strategy is a study plan only strategy. Today no credible river cleanup plan is on the horizon.

Now is the time for action. Our river communities need the immediate release of proposed plans and remedial actions at the MDNR Plainwell Dam and plan and for the Otsego City impoundment by fall 2004 to be followed by removal actions in 2005. Further, the release US EPA proposed plans for the MDNR Otsego and Trowbridge Impoundments need to be made by the spring of 2005.

This Counter proposal to US EPA's modeling project addresses the urgent need to take immediate cleanup actions based on cost effective remedies to solve the immediate environmental and tourism crises facing our community. Despite three decades of study and hundreds of promises by state and federal agencies to cleanup the 80 mile long toxic waste site and hold the polluters accountable, very little has been accomplished.

Cleanup standards must be consistent with wildlife ecological risk assessment, human health assessment, and protection of property values. All PCB-contaminated waste must be disposed of off site in approved landfills and/or areas well above the 500-year floodplain. All PCBs above the level of one part per million (ppm) need to be removed from the riverbanks and former floodplain impounded sediments. The in-stream cleanup standard needs to be .5 ppm. No landfills should be allowed adjacent to the river or within the boundaries of the MDNR impoundments. All wetlands and other significant natural resources should be restored as part of the final remedial action at these sites.

Remedial action must be consistent with the long-term fisheries and wildlife management plans (designed in the early 1970's) to improve the river's fishery, recreation and tourism opportunities by complete removal of the three MDNR and Otsego City dams. For more information call 269-686-7822 or 616-218-4444. Our email address is: krpa@accn.org.